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February 9, 2024

VIA ECF & FACSIMILE

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007
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Vanguard's deadline to respond to the motion at ECF No. 59 is enlarged to February 21, 2024. Replies are due February 28, 2024.

SO ORDERED

/s/ Alvin K. Hellerstein
U.S.D.J.
February 12, 2024

Re: Belen et al. v. Herman et al., Case No. 22-cv-6455 (AKH) (GWG) (S.D.N.Y.)

Your Honor:

This firm represents Defendant The Vanguard Group, Inc. ("Vanguard") in the above-captioned matter and respectfully submits this unopposed request, pursuant to Rule 1(D) of Your Honor's Individual Rules and Practices, for an extension of time to file an opposition brief to Plaintiffs' pending Motion for Reconsideration. [ECF No. 59.]

Plaintiffs filed their Motion for Reconsideration on January 31, 2024. Vanguard's current deadline to respond to the Motion is February 14, 2024. Plaintiffs' counsel and all defense counsel consent to our request that the response be due February 21, 2024.

This is Vanguard's first request to modify the briefing scheduling on the Motion for Reconsideration. Vanguard submits that good cause exists for this extension based on other pending deadlines in this case (including answers which are due on February 13, 2024) and deadlines counsel has in other pending matters.

Other dates previously scheduled after the original date for Vanguard's opposition papers include the: (1) February 23, 2024 – the parties shall make their initial disclosures; (2) February 28, 2024 – the parties shall file a proposed joint case management plan; and (3) March 1, 2024 the parties shall appear for a remote initial case management conference. Vanguard does not believe any of these other dates need to be modified, and takes no position on Defendant Julian Herman's pending motion to stay.

Respectfully submitted,

Hon. Alvin K. Hellerstein
February 9, 2024
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A handwritten signature in black ink, appearing to read "M. Baughman".

Michael E. Baughman

MEB

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cc: all counsel of record (via ECF)